

**LITE DEPALMA GREENBERG
& AFANADOR, LLC**

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*CJA Attorney for Petitioner
Todd Ford, Jr.*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

TODD FORD, JR.,	:	Civil Action No.: 1:20-cv-12655(NLH)
	:	
<i>Petitioner,</i>	:	
	:	
v.	:	
	:	
WARDEN EUGENE CALDWELL,	:	JOINT NOTICE OF MOTION TO SEAL MATERIALS PURSUANT TO LOCAL RULE 5.3
	:	
<i>Respondent</i>	:	
	:	

PLEASE TAKE NOTICE that, on December 5, 2022, or a date and time to be set by the Court, Petitioner Todd Ford, Jr. and Respondent Warden Eugene Caldwell shall move jointly before Hon. Noel L. Hillman U.S.D.J., at the United States District Court for the District of New Jersey Mitchell H. Cohen Building & U.S. Courthouse, 4th & Cooper Streets, Courtroom 3A, Camden, New Jersey 08101, for the entry of an order, pursuant to Local Civil Rules 5.3(c) permanently sealing: (1) the Memorandum of Law in Response to Petition for Writ of Habeas Corpus by Respondent, *see* ECF No. 66; and (2) the Declaration of Susana Cruz

Hodge in Support of Memorandum of Law in Response to Petition for Writ of Habeas Corpus by Respondent and Exhibits 33, 35, 36, and 37 thereto, *see* ECF No. 66.

PLEASE TAKE FURTHER NOTICE that, in support of the within motion, the parties shall rely upon the Declaration of Susana Cruz Hodge in Support of the Joint Motion to Seal Materials, and Exhibit A attached thereto. A proposed form of Order is also submitted for the Court's consideration.

PLEASE TAKE FURTHER NOTICE that a certificate attesting to the date and manner of service of these moving papers is submitted herewith.

**LITE DEPALMA GREENBERG
& AFANADOR, LLC**

Dated: November 8, 2022

/s/ Susana Cruz Hodge

Susana Cruz Hodge

Anthony D. Zatkos

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